

Chris LoPalo

From: Brian A. Bender <Bbender@HarrisBeach.com>
Sent: Monday, May 06, 2013 2:31 PM
To: Chris LoPalo
Cc: Steven J. Rice; Paul J. Napoli; Tiffany M. Lozano
Subject: Re: Lefrak WTC

Steve is defending and is back next week. Then on trial out if town whole month of June. Prepping before that. I'll defer to him on May dates though. Best I can do at the moment.

Unexplainable misspellings courtesy of my iPhone

On May 6, 2013, at 1:45 PM, "Chris LoPalo" <CLoPalo@NapoliBern.com> wrote:

July is too far away. Please propose firm dates in May or June and we will try to make the dates work.

From: Brian A. Bender [<mailto:Bbender@HarrisBeach.com>]
Sent: Monday, May 06, 2013 1:32 PM
To: Chris LoPalo
Cc: Steven J. Rice; Paul J. Napoli; Tiffany M. Lozano
Subject: Re: Lefrak WTC

Chris, I'm still on vacation but I think Charles Mehlman and Gary Flammenbaum are generally available in July. Gary is best on Thursdays - worst on Fridays. You're going to have to move on the discovery, as we stand by our objections there.

Unexplainable misspellings courtesy of my iPhone

On May 6, 2013, at 12:54 PM, "Chris LoPalo" <CLoPalo@NapoliBern.com> wrote:

Brian we are preparing a motion to compel.

Please provide us with the outstanding discovery and a date for your witness' depositions today.

Thank you.

Chris

From: Chris LoPalo
Sent: Wednesday, April 10, 2013 3:07 PM
To: 'Brian A. Bender'; 'Steven J. Rice'; Paul J. Napoli
Cc: Tiffany M. Lozano
Subject: RE: Lefrak WTC

Brian/Steve,

What is the status of your clients' outstanding discovery and deposition?

Chris

From: Chris LoPalo
Sent: Thursday, April 04, 2013 11:19 AM
To: 'Brian A. Bender'; 'Steven J. Rice'; Paul J. Napoli
Cc: Tiffany M. Lozano
Subject: RE: Lefrak WTC

Brian/Steve,

What is the status of your client's outstanding discovery and deposition?

Also Steve I have some questions about your proposed stip.

Let me know if you are available to discuss this tomorrow at 2.

Thanks

Chris

From: Chris LoPalo
Sent: Friday, March 29, 2013 1:20 PM
To: 'Brian A. Bender'; 'Steven J. Rice'; Paul J. Napoli
Subject: RE: Lefrak WTC

Brian/Steve,

What is the status of your client's outstanding discovery and depstion?

Please prepare some dates in April.

Thank you.

Chris

From: Chris LoPalo
Sent: Friday, March 15, 2013 12:00 PM
To: 'Brian A. Bender'; Steven J. Rice; Paul J. Napoli
Subject: RE: Lefrak WTC

No, these

From: Brian A. Bender [<mailto:Bbender@HarrisBeach.com>]
Sent: Friday, March 15, 2013 11:53 AM
To: Chris LoPalo; Steven J. Rice; Paul J. Napoli
Subject: RE: Lefrak WTC

Chris, are we talking about a court-ordered supplement/amendment or one you requested? If it is one you requested, the only request I have is dated 3/12/12, which I responded to on 3/23/12 (see attached).

Brian A. Bender
Partner

HARRIS BEACH PLLC

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practiceGREEN

Save a tree. Read, don't print, emails.

From: Chris LoPalo [<mailto:CLoPalo@NapoliBern.com>]

Sent: Friday, March 15, 2013 11:40 AM

To: Steven J. Rice; Paul J. Napoli

Cc: Brian A. Bender

Subject: RE: Lefrak WTC

Brian/Steve,

What is the status of your client's overdue supplemental and amended discovery responses? As you know their deposition was noticed for 3/28.

If we do not receive the discovery responses by Monday 3/18 we reserve all the Plaintiffs' rights to bring your client back for a continued deposition.

Please advise.

Thank you.

Chris